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May 16, 2003

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MAY 16 2003

HOWARD J. BRAUN
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VIA HAND DELIVERY

Federal Communications Commission
Office of Secretary

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: DA03-622
RM-10666
Comments of Cooperative Television Association

Dear Ms. Dortch:

On behalf of our client, **COOPERATIVE TELEVISION ASSOCIATION**, there is enclosed herewith for filing in the above referenced proceeding an original and four copies of its Comments In Support of NTA's Proposal to Establish A Rural Translator Service.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,


Howard J. Braun

No. of Copies rec'd 04
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

RECEIVED

MAY 16 2003

In re Inquiry to

**ESTABLISH A NATIONAL RURAL
TRANSLATOR SERVICE**

To: MEDIA BUREAU

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Federal Communications Commission
Office of Secretary

DA 03-622

RM-10666

**COMMENTS IN SUPPORT OF NTA'S PROPOSAL
TO ESTABLISH A RURAL TRANSLATOR SERVICE**

COOPERATIVE TELEVISION ASSOCIATION ("CTV"), by its attorneys, hereby files its Comments in response to the Commission's Notice of March 6, 2003 herein requesting comments on the National Translator Association's ("NTA") request to establish a new rural TV translator service. In support thereof, the following is shown:

1. CTV is a non-profit television cooperative organized in October 1992 under the laws of the State of Minnesota. It was formed by the following four Minnesota non-profit electric cooperatives, which are otherwise unrelated, to provide free, off the air TV and other programming services to about 30,000 households in the rural communities of St. James, Frost and Jackson, Minnesota, all of which are located in south west and south central Minnesota:

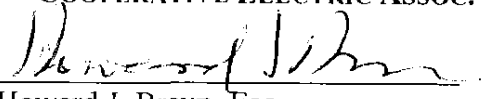
- (a) Federated Rural Electric Association ("Federated Rural");
- (b) South Central Electric Association ("South Central");
- (c) Blue Earth-Nicollet-Faribault Cooperative Electric Association ("Blue Earth");
- and
- (d) Brown County Rural Electrical Association ("Brown County").

2. CTV is entirely owned and operated by the respective cooperatives for the sole purpose of providing 29 channels of TV translator service to the respective communities serviced by the rural electric cooperatives. In fact, the service area of CTV's TV translators is virtually the same as the electric cooperatives. Attached hereto as Appendix A is a list of each of the licenses owned by CTV, Federated Rural, South Central, and Blue Earth. Brown County has no broadcast interests. Importantly, CTV is vitally concerned that TV translators in America continue to flourish in a conducive regulatory environment and that such stations continue to provide free over the air programming to such areas. It is for this reason that CTV fully supports NTA's rulemaking proposal.

3. More specifically, on March 6, 2003, the FCC issued a Notice herein inquiring whether the agency should proceed with a full scale rule making proceeding to establish a national rural translator service as proposed by the NTA. NTA properly believes that inauguration of such a new service will help ensure the delivery of free broadcast services to rural America, especially during the digital conversion. CTV believes that NTA has presented cogent and compelling reasons for the Commission to institute rulemaking proposing simplified procedures to establish a new rural TV translator service to serve America's hinterlands and rural areas.

4. Accordingly, CTV urges the FCC to solicit formal comments from all interested parties on NTA's request. In short, given the Commission's avowed goal of establishing a DTV broadcast service with the attendant benefits of HDTV, a free over the air commercial and non-commercial broadcast service can only be guaranteed in rural areas such as western and southern central Minnesota by TV translators in the manner proposed by NTA. Given these circumstances, NTA's rulemaking proposal ought to be adopted by the Commission.

Respectfully submitted,
COOPERATIVE TELEVISION ASSOC.
FEDERATED RURAL ELECTRIC ASSOC.
SOUTH CENTRAL ELECTRIC ASSOC.
BLUE EARTH-NICOLLET-FARIBAUT
COOPERATIVE ELECTRIC ASSOC.


By: Howard J. Braun, Esq.
Its Attorneys

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May 16, 2003

Cooperative Television Association of Southern Minnesota

Cooperative Television Association of Southern Minnesota

K14KE, St. James, MN
K16CG, St. James, MN
K21DG, St. James, MN
K24CP, St. James, MN
K26CS, St. James, MN
K35DC, St. James, MN
K40BU, St. James, MN
K42AV, St. James, MN
K44AD, St. James, MN
K46AA, St. James, MN
K48AA, St. James, MN
K50AB, St. James, MN
K52AB, St. James, MN
K54AC, St. James, MN

Blue Earth-Nicollet-Faribault Cooperative Electric Association

K58FC, Frost, MN
K59FN, Jackson, MN
K60FY, Frost, MN
K61GE, Jackson, MN
K62FH, Frost, MN

Federated Rural Electric Association

K45EH, Jackson, MN
K47EL, Jackson, MN
K51EN, Jackson, MN
K53EV, Jackson, MN
K57GE, Jackson, MN

South Central Electric Association

K14KD, Frost, MN
K27FI, Frost, MN
K31EF, Frost, MN
K36FI, Frost, MN
K65FW, Frost, MN

CERTIFICATE OF SERVICE

I, Karen Kelly, a secretary at Katten Muchin Zavis Rosenman, hereby certify that on this 16th day of May 2003, a copy of the foregoing **COMMENTS IN SUPPORT OF NTA'S PROPOSAL TO ESTABLISH A RURAL TRANSLATOR SERVICE** was sent via first class US Mail, to the following:

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Karen R. Kelly